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15 Attorneys for Plaintiff

16 **IN THE UNITED STATES DISTRICT COURT**
17 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
18 **WESTERN DIVISION**

19 **CANH LE,**

20 **Plaintiff,**

21 **v.**

22 **DIRECTV, LLC,**

23 **Defendant.**

24 **Case No. 16-cv-1369 SVW (AS)**

25 **PLAINTIFFS' INDEX OF EXHIBITS**
26 **IN SUPPORT OF MOTION FOR**
27 **PARTIAL SUMMARY JUDGMENT**

28 **Date: September 11, 2017**

Time: 1:30 p.m.

Courtm: 10A

Hon. Stephen V. Wilson

EXHIBIT NO.	DOCUMENT
1	DIRECTV data indicating on Tabs “Activities” and “Order Line Items” some DIRECTV work Plaintiff Guzik performed (DTV-CA_GUZYK000089)
2	DIRECTV data indicating on Tabs “Activities” and “Order Line Items” some DIRECTV work Plaintiff Kidd performed (DTV-CA_KIDD000097)
3	DIRECTV data indicating on Tabs “Activities” and “Order Line Items” some DIRECTV work Plaintiff Lasater performed (DTV-CA_LASATER000097)
4	DIRECTV data indicating on Tabs “Activities” and “Order Line Items” some DIRECTV work Plaintiff Le performed (DTV-CA_LE000049)
5	DIRECTV data indicating on Tabs “Activities” and “Order Line Items” some DIRECTV work Plaintiff Lhkagvadorj performed (DTV-CA_LKHAGVADORJ000061)
6	DIRECTV data indicating on Tabs “Activities” and “Order Line Items” some DIRECTV work Plaintiff Nault performed (DTV-CA_NAULT000040)
7	DIRECTV data indicating on Tabs “Activities” and “Order Line Items” some DIRECTV work Plaintiff Juarez performed (DTV-CA_JUAREZ000093)
8	DIRECTV data indicating on Tabs “Activities” and “Order Line Items” some DIRECTV work Plaintiff Trujeque performed (DTV-CA_TRUJEQUE000168)
9	DIRECTV data indicating on Tabs “Activities” and “Order Line Items” some DIRECTV work Plaintiff Varas performed (DTV-CA_VARAS000055)
10	DIRECTV 2014 Form 10-K (PLTF-CDCA00000965-1122)
11	DIRECTV Services Prover Agreement (Gipson CDCA Deposition Exhibit 1)
12	Cited portions of the transcript of the deposition of David Baker taken on 8/25/16 in the <i>Arndt v. DIRECTV, LLC</i> (“Baker Arndt Dep.”)
13	Cited portions of the transcript of the deposition of Adrian Dimech taken on 11/3/16 in the CDCA cases (“Dimech CDCA Dep.”)
14	Cited portions of the transcript of the deposition of David Baker taken on 3/22/17 in the CDCA cases

EXHIBIT NO.	DOCUMENT
	("Baker CDCA Dep.")
15	DIRECTV document showing acquisitions of other companies (DTV-Global00029471)
16	Cited portions of the transcript of the deposition of Michael Butao taken on 11/4/16 in the CDCA cases ("Butao CDCA Dep.")
17	Cited portions of the transcript of the deposition of Todd Bartlett taken on 5/24/16 in <i>Andersen v. DIRECTV, LLC</i> ("Bartlett Andersen Dep.")
18	Email Correspondence (Baker CDCA Deposition Exhibit 29)
19	Email Correspondence with Attachments (Baker CDCA Deposition Exhibit 42)
20	Cited portions of the transcript of the deposition of Marc Mastin taken on 11/11/16 in the CDCA cases ("Mastin CDCA Dep.")
21	Email Correspondence with Attachments (DTV-CDCA00029837)
22	Email Correspondence with Attachments (DTV-CDCA00006791)
23	Cited portions of the transcript of the deposition of David Baker taken on 1/22/15 in <i>Perez v DIRECTV, LLC</i> ("Baker Perez Dep.")
24	Email Correspondence with Attachments (Baker CDCA Deposition Exhibit 43)
25	Cited portions of the transcript of the deposition of Maria Shropshire taken on 10/28/16 in the CDCA cases ("Shropshire CDCA Dep.")
26	Email Correspondence (Baker Deposition Exhibit 28)
27	Cited portions of the transcript of the deposition of Steven Crawford taken on 11/8/16 in the CDCA cases ("Crawford CDCA Dep.")
28	Email Correspondence with Attachments (Thomas CDCA Deposition Exhibit 2)
29	DIRECTV Services Provider Agreement (DTV-CA_GUZI000038)
30	DIRECTV Services Provider Agreement (DTV-CA_LASATER000001)

EXHIBIT NO.	DOCUMENT
31	DIRECTV Services Provider Agreement (DTV-CA_LE000001)
32	DIRECTV Services Provider Agreement (DTV-CA_LKHAGVADORJ000001)
33	DIRECTV Services Provider Agreement (DTV-CA_VARAS000001)
34	DIRECTV Services Provider Agreement (DTV-CA_JUAREZ000044)
35	DIRECTV Services Provider Agreement (DTV-CA_TRUJEQUE000001)
36	DIRECTV Services Provider Agreement DTV-CA_TRUJEQUE000075
37	DIRECTV Services Provider Agreement (DTV-CA_TRUJEQUE000043)
38	DIRECTV 2016 Services Provider Agreement (DTV-CA_GUZIK000001)
39	DIRECTV 2016 Services Provider Agreement (DTV-CA_LASATER000052)
40	DIRECTV Services Provider Agreement with the subcontractor at issue in <i>Perez v. Lantern Light</i>
41	Cited portions of the transcript of the deposition of Scott Thomas taken on 2/16/1 in the CDCA cases ("Thomas CDCA Dep.")
42	Cited portions of the transcript of the deposition of Paul Yang taken on 4/26/17 in the CDCA cases ("Yang CDCA Dep.")
43	Email Correspondence (Baker CDCA Deposition Exhibit 16)
44	Email Correspondence (Baker CDCA Deposition Exhibit 20)
45	Cited portions of the transcript of the deposition of William Bennett taken on 12/6/16 in the CDCA cases ("Bennett CDCA Dep.")
46	Email Correspondence (Baker CDCA Deposition Exhibit 21)
47	DIRECTV Blast Facts Email (DIRECTV002492)
48	Cited portions of the transcript of the deposition of Christopher Altomari taken on 3/5/15 in <i>Arnold v. DIRECTV, INC.</i>

EXHIBIT NO.	DOCUMENT
	("Altomari <i>Arnold</i> Dep.")
49	March 2011 DIRECTV Required Training Video
50	Standard Professional Installation Guidelines ("SPIG") (DTV-CA_GUZI000172)
51	Email Correspondence with Attachment (Baker CDCA Deposition Exhibit 36)
52	DIRECTV Required Training Facilitator Guide (Altomari <i>Arnold</i> Deposition Exhibit 20)
53	October 2010 DIRECTV Required Training Video
54	DIRECTV Installation Technician Job Description (DIRECTV061658)
55	DIRECTV excel document explaining the Siebel system with regard to subcontractor technicians (DTV-CDCA00016522)
56	Cited portions of the transcript of the deposition of David Baker taken on 5/21/15 in <i>Arnold v. DIRECTV, INC.</i> ("Baker <i>Arnold</i> Dep.")
57	DIRECTV Technician Report showing W-2 and Subcontractor technicians' names, contact information, regularly scheduled hours, skill sets, service region, tech team, and employment status including Plaintiffs Lasater, Le, Guzik, Varas, and Trujeque (DTV_Global00254294)
58	DIRECTV Technician Report showing W-2 and Subcontractor technicians' efficiency rating, how much time each technician has for lunch, each technician's scheduled lunch time, and the maximum distance for which a technician can be scheduled for a work order including, for example, Plaintiff Lasater (DTV_Global00068074)
59	DIRECTV record of Plaintiff Guzik's closed line items for payment purposes including work order number, category of work performed, customer, date, payment data, and products installed (DTV-CA_GUZI000213)
60	DIRECTV record of Plaintiff Kidd's closed line items for payment purposes including work order number, category of work performed, customer, date, payment data, and products installed (DTV-CA_KIDD00167)
61	DIRECTV record of Plaintiff Lasater's closed line items for payment purposes including work order number, category of work performed, customer, date, payment data, and products installed

EXHIBIT NO.	DOCUMENT
	(DTV-CA_LASATER000221)
62	DIRECTV record of Plaintiff Le's closed line items for payment purposes including work order number, category of work performed, customer, date, payment data, and products installed (DTV-CA_LE000102)
63	DIRECTV record of Plaintiff Lkhagavdorj's closed line items for payment purposes including work order number, category of work performed, customer, date, payment data, and products installed (DTV-CA_LKHAGAVDORJ000133)
64	DIRECTV record of Plaintiff Juarez's closed line items for payment purposes including work order number, category of work performed, customer, date, payment data, and products installed (DTV-CA_JUAREZ000160)
65	DIRECTV record of Plaintiff Trujeque's closed line items for payment purposes including work order number, category of work performed, customer, date, payment data, and products installed (DTV-CA_TRUJEQUE000221)
66	DIRECTV record of Plaintiff Varas' closed line items for payment purposes including work order number, category of work performed, customer, date, payment data, and products installed (DTV-CA_VARAS_000127)
67	Email Correspondence (Baker CDCA Deposition Exhibit 56)
68	Email Correspondence with Attachment (DTV-Global00135882)
69	DIRECTV excel report regarding work order assigned durations (DTV-Global00135883)
70	Email Correspondence with Attachments (DTV-CDCA00029371)
71	Cited portions of the transcript of the deposition of Federico Zambrano taken on 5/11/17 in the CDCA cases (“Zambrano CDCA Dep.”)
72	Email Correspondence with Attachments (DTV-CDCA00009049)
73	Declaration of Kyle Wells
74	Email Correspondence with Attachments (DTV-CDCA00029885-29940)
75	Email Correspondence with Attachment (Baker Deposition Exhibit 54)

EXHIBIT NO.	DOCUMENT
76	Email Correspondence (DTV-Global00338898)
77	DIRECTV Blast Facts Email (DIRECTV021468)
78	Email Correspondence with Attachment (Dimech CDCA Deposition Exhibit 8)
79	Email Correspondence (Baker CDCA Deposition Exhibit 33)
80	Email Correspondence with Attachment (DTV-Global00101191)
81	Email Correspondence (Thomas CDCA Deposition Exhibit 19)
82	Email Correspondence (Baker CDCA Deposition Exhibit 39)
83	Email Correspondence with Attachment (DTV-Global004489922)
84	Email Correspondence with Attachment (DTV-CDCA00016069-16071)
85	Email Correspondence with Attachment (DTV-CDCA00000512)
86	Email Correspondence (Baker CDCA Deposition Exhibit 25)
87	Email Correspondence (Baker CDCA Deposition Exhibit 26)
88	Email Correspondence (Baker CDCA Deposition Exhibit 22)
89	Email Correspondence with Attachment (DTV-Global00157828)
90	Email Correspondence with Attachment (DTV-Global00132776)
91	Email Correspondence (DTV-Global00337962)
92	Email Correspondence with Attachment (Thomas CDCA Deposition Exhibit 6)
93	Cited portions of the transcript of the deposition of Matt Gray taken on 2/22/17 in the CDCA cases ("Gray CDCA Dep.")
94	Email Correspondence (Rendon CDCA Deposition Exhibit 12)

EXHIBIT NO.	DOCUMENT
95	Email Correspondence (DTV-Global00335951)
96	Email Correspondence with Attachment (DTV-Global00100467)
97	Email Correspondence (DTV-Global00338591)
98	Email Correspondence (DTV-Global00341369)
99	Email Correspondence (DTV-Global00133722)
100	Email Correspondence (Thomas CDCA Deposition Exhibit 21)
101	Email Correspondence (Thomas CDCA Deposition Exhibit 5)
102	Email Correspondence (DTV-Global00340737)
103	Email Correspondence and Attachment (Thomas CDCA Deposition Exhibit 8)
104	Email Correspondence (DTV-Global00340718)
105	Cited portions of the transcript of the deposition of Michael Perez taken on 4/14/17 in the CDCA cases ("Perez CDCA Dep.")
106	Cited portions of the transcript of the deposition of Deshon Gipson taken on 5/23/17 in the CDCA cases ("Gipson CDCA Dep.")
107	DIRECTV, LLC 5/30/17 Responses to Lasater's 6 th Request for Production
108	DIRECTV, LLC 5/24/17 Responses to Guzik's 5th Request for Production
109	DIRECTV, LLC 5/30/17 Responses to Le's 6th Request for Production
110	DIRECTV, LLC 5/30/17 Responses to Trujeque's 6th Request for Production
111	Email Correspondence (Baker CDCA Deposition Exhibit 14)
112	Email Correspondence (DTV-Global00335887)
113	Email Correspondence (Thomas CDCA Deposition Exhibit 3)

EXHIBIT NO.	DOCUMENT
114	Email Correspondence (Baker CDCA Deposition Exhibit 35)
115	Email Correspondence (DTV-CDCA00009552)
116	DIRECTV Activity/Work Order Policies and Procedures Revised March 26, 2010 (DTV-Global00154407)
117	DIRECTV Custom Labor Policy and Procedures (DTV-CDCA00024368)
118	Cited portions of the transcript of the deposition of Scott Barnes taken on 9/24/15 in <i>Arndt v DIRECTV, LLC</i> ("Barnes Arndt Dep.")
119	Email Correspondence (DTV-CDCA00023243)
120	Email Correspondence and Attachment (Thomas CDCA Deposition Exhibit 15)
121	Email Correspondence with Attachment (DTV-Global00255991)
122	DIRECTV, Inc. Certificate of Ownership filed with the California Secretary of State for Connect Television, Inc.
123	Email Correspondence with Attachment (Baker CDCA Deposition Exhibit 11)
124	Email Correspondence (Baker CDCA Deposition Exhibit 6)
125	Email Correspondence (DTV-Global00090676)
126	Email Correspondence (DTV-CDCA00018357)
127	Email Correspondence (Baker CDCA Deposition Exhibit 8)
128	Email Correspondence (Baker CDCA Deposition Exhibit 9)
129	Email Correspondence (Baker CDCA Deposition Exhibit 51)
130	Email Correspondence (Baker CDCA Deposition Exhibit 3)
131	Email Correspondence with Attachment (Gray CDCA Deposition Exhibit 6)

Dated: July 7, 2017

STUEVE SIEGEL & HANSON LLP

By /s/ J. Toji Calabro

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